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SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

JOSHUE GEORGE HARRELL,
aka JOSHUA ELLIS HARRELL

Defendant.

CRIMINAL NO. JRR 24cr249

(Possession of a Firearm and
Ammunition by a Prohibited Person,
18 U.S.C. § 922(g)(1); Possession with
Intent to Distribute a Controlled
Substance, 21 U.S.C. § 841(a);
Forfeiture, 18 U.S.C. § 924(d), 21
U.S.C. § 853, 28 U.S.C. § 2461(c)

INDICTMENT

COUNT ONE

(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about April 25, 2024, in the District of Maryland, the Defendant,

JOSHUE GEORGE HARRELL, aka JOSHUA ELLIS HARRELL,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit, a Dan Wesson Arms, model 15, .357 Magnum caliber revolver bearing serial number 001181, and six rounds of R-P, .357 Magnum ammunition, and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)

COUNT TWO
(Possession with the Intent to Distribute a Controlled Substance)

The Grand Jury for the District of Maryland charges that:

On or about April 25, 2023, in the District of Maryland, the Defendant,

JOSHUE GEORGE HARRELL, aka JOSHUA ELLIS HARRELL,

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance.

21 U.S.C. § 841(a)(1)

COUNT THREE
(Possession with the Intent to Distribute a Controlled Substance)

The Grand Jury for the District of Maryland charges that:

On or about May 2, 2024, in the District of Maryland, the Defendant,

JOSHUE GEORGE HARRELL, aka JOSHUA ELLIS HARRELL,

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance.

21 U.S.C. § 841(a)(1)

COUNT FOUR
(Possession of a Firearm by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about May 16, 2024, in the District of Maryland, the Defendant,

JOSHUE GEORGE HARRELL, aka JOSHUA ELLIS HARRELL,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit, a Smith & Wesson, model M&P 15-22, .22 LR caliber rifle bearing serial number LAK0290, and the firearm was in and affecting commerce.

18 U.S.C. § 922(g)

COUNT FIVE
(Possession with the Intent to Distribute a Controlled Substance)

The Grand Jury for the District of Maryland charges that:

On or about May 16, 2024, in the District of Maryland, the Defendant,

JOSHUE GEORGE HARRELL, aka JOSHUA ELLIS HARRELL,

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance.

21 U.S.C. § 841(a)(1)

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendant's conviction under any of the offenses charged in Counts One through Three of this Indictment.

Narcotics Forfeiture

2. Upon conviction of the offenses alleged in Counts Two, Three, or Five, the Defendant,

JOSHUE GEORGE HARRELL, aka JOSHUA ELLIS HARRELL,

shall forfeit to the United States, pursuant to 21 U.S.C. § 853:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense.

Firearms and Ammunition Forfeiture

3. Upon conviction of the offense(s) alleged in Counts One or Four, the Defendant,

JOSHUE GEORGE HARRELL, aka JOSHUA ELLIS HARRELL,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in such offense(s).

Property Subject to Forfeiture

4. The property to be forfeited includes, but is not limited to, the following:

- a. , a Dan Wesson Arms, model 15, .357 Magnum caliber revolver bearing serial number 001181;
- b. A Smith & Wesson, model M&P 15-22, .22 LR caliber rifle bearing serial number LAK0290; and
- c. approximately six rounds of R-P, .357 Magnum ammunition.

Substitute Assets

5. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 924(d)

21 U.S.C. § 853

28 U.S.C. § 2461(c)

Erek L. Barron /PR
Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

08-21-24
Date